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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 REGINALD SULLIVAN,

9 Plaintiff,

10 vs.

11 CLARK COUNTY, a political subdivision of
12 the State of Nevada; JOHN MARTIN in his
13 official and/or individual capacities;
PATRICK SCHREIBER in his official and/or
individual capacities,

14 Defendants.

CASE NO. 2:18-cv-00825-GMN-DJA

**STIPULATION AND ORDER TO
EXTEND TIME FOR PARTIES TO
SUBMIT JOINT PRE-TRIAL ORDER**

(Second Request)

15 The parties, by and through their respective counsel, hereby stipulate to extend the
16 time to submit the Joint Pre-Trial Order that is due on Friday, May 7, 2021 through and
17 including **Friday, May 21, 2021**.

18 This is the second request for an extension of this deadline. The parties provide the
19 following information to the Court regarding the proposed extension of time:

- 20 1. Defendants' counsel have prepared a draft Joint Pre-Trial Order (JPTO) and
21 Plaintiff's counsel is in the process of reviewing it and will be giving input
22 and feedback;
- 23 2. Plaintiff's counsel has had a heavy workload including six depositions
24 scheduled this week and working on a significant motion to compel in the
25 same case which was coming down toward the close of discovery

1 (although a last minute extension has just been granted due to the motion
2 practice) and this has prevented him from being able to address the JPTO
3 in this case due to those pressing deadlines;

4 3. The parties understand that this 14 day extension should not impact the
5 matter unduly because there is no trial date set and trials are just now
6 beginning to be set as the nation comes out of the COVID-19 pandemic
7 restrictions that have prevented trials for over a year now.

8 This stipulation to extend the deadline is made in good faith and not for purposes of
9 delay.

10 DATED this 7th day of May, 2021.

11 KEMP & KEMP, ATTORNEYS AT LAW

12 By: /s/ James P. Kemp
13 JAMES P. KEMP, ESQ.
14 Nevada Bar No. 6375
15 7435 W. Azure Drive, Suite 110
16 Las Vegas, Nevada 89130
17 *Attorneys for Plaintiff*

18 DATED this 7th day of May, 2021.

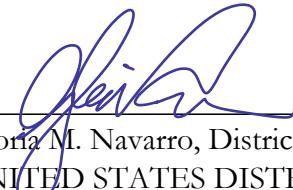
19 LEWIS BRISBOIS BISGAARD & SMITH LLP

20 By: /s/ Robert W. Freeman
21 ROBERT W. FREEMAN, ESQ.
22 Nevada Bar No. 003062
23 6385 S. Rainbow Boulevard, Suite 600
24 Las Vegas, Nevada 89118
25 *Attorneys for Defendants*

26 **ORDER**

27 **IT IS SO ORDERED.**

28 Dated this 7 day of May, 2021.

29 
30 _____
31 Gloria M. Navarro, District Judge
32 UNITED STATES DISTRICT COURT